

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

**JANE DOE,**

**Plaintiff,**

**vs.**

**LIMESTONE UNIVERSITY F/K/A  
LIMESTONE COLLEGE, COLLINS  
MURPHY, MG FREESITES, LTD., d/b/a  
PORNHUB.COM, and HAMMY MEDIA  
LTD. d/b/a XHAMSTER.COM,**

**Defendants.**

**Case No.: 7:21-CV-03193-JD**

**PLAINTIFF'S MOTION TO HOLD  
RULING IN ABEYANCE**

Plaintiff, Jane Doe (hereinafter referred to as "Plaintiff") by and through her undersigned counsel respectfully moves this Court for an Order holding the ruling on Defendant Hammy Media LTD.'s Motion for Judgment on the pleadings in abeyance. Plaintiff requests the Court hold its ruling in abeyance until the pending Motion to Reconsider and Motion to Amend currently before the court in c/a no. 7:20-cv-00947-JD are resolved to best serve the judicial economy and to minimize duplication of effort by the Court. Plaintiff submits to the Court that holding its ruling in the present case in abeyance avoids wasting the judiciary's time and resources. An abeyance in this case would be appropriate, as the issues of fact and law that are in dispute, here, are substantially similar to those in the associated case and the Defendants are the same. In support of this Motion, Plaintiff relies on the statements herein, the pleadings filed in this case; the rules of Court and such other matters as may be properly presented to the Court. This abeyance will cause no undue delay or burden on Defendants and is being made in good faith. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

Therefore, the Plaintiff respectfully requests this Court enter an Order holding its ruling on Defendant Hammy Media LTD.'s Motion for Judgment on the pleadings in abeyance until the Motion for Reconsideration and Motion to Amend in the associated case c/a no. 7:20-cv-00947-JD are resolved.

Respectfully submitted,

**BELL LEGAL GROUP, LLC**

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280)  
Joshua M. W. Salley (#13214)  
BELL LEGAL GROUP, LLC  
219 North Ridge Street  
Georgetown, SC 29440  
Telephone: (843) 546-2408  
jeb@edbelllaw.com  
jsalley@edbelllaw.com  
***Counsel for Plaintiff***

**DOLT, THOMPSON, SHEPHERD & CONWAY, PSC**

Tyler S. Thompson (*Pro Hac Vice Application forthcoming*)  
Liz J. Shepherd ( *Pro Hac Vice Application forthcoming*)  
Jordan A. Stanton (*Pro Hac Vice Application forthcoming*)  
DOLT, THOMPSON, SHEPHERD & CONWAY, PSC  
13800 Lake Point Circle  
Louisville, KY 40223  
Telephone: (502) 244-7772  
tthompson@kytrial.com  
lshepherd@kytrial.com  
jstanton@kytrial.com  
***Counsel for Plaintiff***

April 1, 2022  
Georgetown, SC